

Appl. No. 09/887,193
Amdt. dated March 19, 2004
Reply to Office action of December 19, 2003

REMARKS

This is in response to the Office Action mailed December 19, 2003. The Office Action rejected Applicants' Claim 13-17 and 25-27 as being anticipated by U.S. Pat. No. 6,438,561 ("Israni") and rejected Claims 1-12, 18-24 and 28 as obvious in view of the combination of Israni and U.S. Publication 2002/0023010 ("Rittmaster").

With this response, Applicants respectfully request reconsideration of Claims 1-28 in view of the following remarks. Applicants submit that Claims 1-28 are in condition for allowance.

Drawings

The Office Action objected to Figure 1 of the drawings suggesting that a legend be included. Applicants' amendments to the drawings add a legend to and remove erroneous reference numbers 112 and 116 from Figure 1.

Claim 13

Applicants' independent Claim 13 relates to a geographic database comprising road segment data that represent road segments located in a geographic region. The geographic database also comprises advertising zone data associated with the road segment data. The advertising zone data indicates which advertising zones the road segments are located in.

Claim 13 was rejected as being anticipated by Israni. Applicants submit that Israni does not anticipate Claim 13 because Israni does not disclose all of the elements of this claim. Although, Israni does disclose a geographic database comprising road segment data (See: Israni: column 8, lines 5-15), Israni does not disclose the advertising zone data indicating which advertising zones the road segments are located in.

The Office Action stated that Israni teaches the advertising zone data by associating each road segment data entity with geographic region data that represent location as show in Figures 4 and 5, specifically elements 216 and 222 of Figure 5. (See: Office Action, page 3). However, the Applicants respectfully point out that Figure 4 of Israni merely illustrates a map 210 showing a geographic region 214 and Figure 5 illustrates a portion 216 of the map 210 illustrating road segments 222. (See: Israni: column 8, lines 22-26, 53-55 and 65-67). Applicants also respectfully point out that Israni discloses geographic position data (latitude and longitude) of the endpoints (nodes) of the road segment associated with road segment

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data records, (See: Israni: column 9, lines 8-15); however, Israni does not disclose the advertising zone data that indicates which advertising zone the road segments are located in. The road segments data records of Israni are not associated with data indicating advertising zone; rather, the Israni road segment data records are associated with data indicating geographic position (latitude and longitude) not advertising zone.

Because Israni fails to disclose all of the limitations of Applicants' Claim 13, Israni does not anticipate this claim. Applicants respectfully request that the rejection of Claim 13 be withdrawn.

Claim 25

Applicants' independent Claim 25 relates to a method of delivering location-based warnings. The method determines a position of a mobile computing platform. The method also determines in which of a plurality of zones into which the geographic region is divided the mobile computing platform is located.

Claim 25 was rejected as being anticipated by Israni. Applicants submit that Israni does not anticipate Claim 25 because Israni does not disclose all of the elements of this claim. Specifically, Israni does not disclose determining in which of a plurality of zones into which the geographic region is divided the mobile computing platform is located.

The Office Action stated that Israni teaches determining in which of a plurality of zones the mobile computing platform is located by providing vehicle positioning services. (See: Office Action, page 3). However, the Applicants respectfully point out that vehicle positioning services identify a road segment on which the vehicle is traveling based in part on information from a positioning system and the geographic database. The vehicle positioning services identified by Israni do not determine in which of the zones the mobile computing platform is located. Furthermore, Applicants respectfully point out that location data records in the geographic database that identify road segments associated with positions represented by traffic location reference codes in traffic broadcast messages do not teach determining in which of a plurality of zones the mobile computing platform is located. Rather, the location data records allow the navigation system to determine which road segments are affected by the traffic incident of the traffic broadcast message. (See: Israni: column 23, lines 51-53).

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Because Israni fails to disclose all of the limitations of Applicants' Claim 25, Israni does not anticipate this claim. Applicants respectfully request that the rejection of Claim 25 be withdrawn.

Claims 1

Applicants' independent Claim 1 relates to a method of facilitating delivery of advertising messages. The method associates with each data entity that represents a road segment data that indicate in which of the advertising zones the road segment is located.

Claim 1 was rejected as obvious in view of Israni and Rittmaster. Applicants submit that Claim 1 is patentable over the combination because this combination does not disclose all of the elements of this claim. Specifically, the combination fails to disclose associating with each data entity that represents a road segment data that indicate in which of the advertising zones the road segments are located in.

Similarly, as discussed above in conjunction with Claim 13, Israni fails to disclose associating with each data entity that represents a road segment data that indicate in which of the advertising zones the road segments are located in. Additionally, Rittmaster fails to disclose associating with each data entity that represents a road segment data that indicate in which of the advertising zones the road segments are located in. In fact, Rittmaster completely fails to mention data that represents a road segment.

Because the combination fails to disclose all of the limitations of Applicants' Claim 1, this claim is not obvious over the combination. Applicants respectfully request that the rejection of Claim 1 be withdrawn.

Claims 7

Applicants' independent Claims 7 relates to a method of facilitating delivery of advertising. The method associates with each data entity that represents a road segment data that indicates in which of the advertising areas the road segment is located.

Claim 7 was rejected as obvious in view of Israni and Rittmaster. Applicants submit that Claim 7 is patentable over the combination because this combination does not disclose all of the elements of this claim. Specifically, the combination fails to disclose associating with each data entity that represents a road segment data that indicate in which of the advertising areas the road segment is located.

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Similarly, as discussed above in conjunction with Claim 13, Israni fails to disclose associating with each data entity that represents a road segment data that indicate in which advertising areas the road segment is located. Additionally, Rittmaster fails to disclose associating with each data entity that represents a road segment data that indicate in which of the advertising areas the road segments are located in. In fact, Rittmaster completely fails to mention a data entity that represents a road segment.

Because the combination fails to disclose all of the limitations of Applicants' Claim 7, this claim is not obvious over the combination. Applicants respectfully request that the rejection of Claim 7 be withdrawn.

Claim 18

Applicants' independent Claim 18 relates to a method of delivering advertising. The method determines a position of a mobile computing platform and determines in which of a plurality of advertising zones into which the geographic region is divided the user is located.

Claim 18 was rejected as being obvious in view of the combination of Israni and Rittmaster. Applicants submit that Claim 18 is patentable over the combination because this combination does not disclose all of the elements of this claim. Specifically, the combination fails to disclose determining in which of a plurality of advertising zones into which the geographic region is divided the mobile computing platform is located.

Similarly, as discussed above in conjunction with Claim 25, Israni fails to disclose determining in which of a plurality of zones into which the geographic region is divided the mobile computing platform is located. Additionally, Rittmaster fails to disclose determining which of a plurality of advertising zones in which the geographic region is divided the mobile computing platform is located. Rather, Rittmaster merely discloses providing advertising messages relating to stores in a shopping area to a mobile user located in the shopping area. (See: Rittmaster, page 15, paragraph 0127).

Because the combination fails to disclose all of the limitations of Applicants' Claim 18, this claim is not obvious over the combination. Applicants respectfully request that the rejection of Claim 18 be withdrawn.

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Claim 20

Applicants' independent Claim 20 relates to a method of providing advertising. The method defines advertising areas within a geographic region, determines a position of a mobile computing platform and determines in which of said advertising areas the mobile computing platform is located.

Claim 20 was rejected as being obvious in view of the combination of Israni and Rittmaster. Applicants submit that Claim 20 is patentable over the combination because this combination does not disclose all of the elements of this claim. Specifically, the combination fails to disclose determining in which of said advertising areas the mobile computing platform is located.

Similarly, as discussed above in conjunction with Claim 25, Israni fails to disclose determining in which of the advertising areas the mobile computing platform is located. Additionally, Rittmaster fails to disclose determining in which of the advertising areas the mobile computing platform is located. Rather, Rittmaster merely discloses providing advertising messages relating to stores in a shopping area to a mobile user located in the shopping area. (*See*: Rittmaster, page 15, paragraph 0127).

Because the combination fails to disclose all of the limitations of Applicants' Claim 20, this claim is not obvious over the combination. Applicants respectfully request that the rejection of Claim 20 be withdrawn.

Claim 28

Applicants' independent Claim 28 relates to a method of delivering advertising. The method determines a position of a mobile computing platform and dynamically forms an advertising zone associated with the position of the mobile computing platform.

Claim 28 was rejected as being obvious in view of the combination of Israni and Rittmaster. Applicants submit that Claim 28 is patentable over the combination because this combination does not disclose all of the elements of this claim. Specifically, the combination fails to disclose dynamically forming an advertising zone associated with the position of the mobile computing platform.

Israni completely fails to disclose dynamically forming an advertising zone associated with the position of the mobile computing platform; rather, Israni merely performs vehicle

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positioning (map matching) to identify a road segment on which the vehicle is traveling. (See: Israni, column 7, lines 39-42). Israni fails to mention dynamically forming an advertising zone. Additionally, Rittmaster fails to disclose dynamically forming an advertising zone associated with the position of the mobile computing platform. Rather, Rittmaster merely discloses providing advertising messages relating to stores in a shopping area to a mobile user located in the shopping area. (See: Rittmaster, page 15, paragraph 0127). Neither reference mentions forming an advertising zone.

Because the combination fails to disclose all of the limitations of Applicants' Claim 28, this claim is not obvious over the combination. Applicants respectfully request that the rejection of Claim 28 be withdrawn

Claims 2-6, 8-12, 14-17, 19, 21-24 and 26-27

Applicants' dependent Claims 2-6, 8-12, 14-17, 19, 21-24 and 26-27 are allowable at least for the reason that they depend upon allowable base claims. In addition, these claims include features that are not disclosed by the cited references.

Information Disclosure Statements

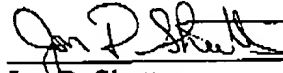
Applicants have not received initialed copies of submitted Information Disclosure Statement 1449 forms. For the Examiner's convenience, Applicants have attached copies of an Information Disclosure Statement filed on September 10, 2001, Second Information Disclosure Statement filed on May 23, 2002 and a Third Information Disclosure Statement filed on September 15, 2003.

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Conclusion

With the present response, all the issues in the Office Action mailed December 19, 2003 have been addressed. Applicants submit that the present application has been placed in condition for allowance. If any issues remain, the Examiner is requested to call the undersigned at the telephone number indicated below.

Respectfully submitted,



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